

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

IN RE: KEITH M. SCRIVEN D/B/A Hanlan Midgett Sciven, LLC D/B/A Hanlan Midgett Sciven, LP D/B/A Sciven, Inc. Debtor	Case No. 22-11818-amc
Deutsche Bank National Trust Company, as Trustee for American Home Mortgage Assets Trust 2006-1, Mortgage-Backed Pass-Through Certificates, Series 2006-1, Movant  vs. KEITH M. SCRIVEN D/B/A Hanlan Midgett Sciven, LLC D/B/A Hanlan Midgett Sciven, LP D/B/A Sciven, Inc. Respondent	Chapter 11         11 U.S.C. §362

**STIPULATION IN SETTLEMENT TO ALLOW RELIEF  
FROM THE AUTOMATIC STAY**

It is hereby stipulated by and between Brock & Scott, PLLC, counsel for the Movant, Deutsche Bank National Trust Company, as Trustee for American Home Mortgage Assets Trust 2006-1, Mortgage-Backed Pass-Through Certificates, Series 2006-1, and RONALD G. MCNEIL, Esquire, counsel for the Debtor, as follows:

**WHEREAS**, Keith M. Scriven is the Debtor in the above-captioned bankruptcy;

**WHEREAS**, Keith M. Scriven is the owner of the property located at 25 Widgeon Road, Fire Island Pines; New York 11782;

**WHEREAS**, Deutsche Bank National Trust Company, as Trustee for American Home Mortgage Assets Trust 2006-1, Mortgage-Backed Pass-Through Certificates, Series 2006-1, is the holder of a secured lien on the Property;

**WHEREAS**, Debtor's Chapter 11 Plan calls for the abandonment or sale of the property;

**WHEREAS**, Respondent filed an Objection to the Confirmation of Debtor's Chapter 11 Plan;

**WHEREAS**, the parties desire to amicably resolve the Objection to Confirmation of Debtors' Objection to Plan.

**NOW THEREFORE**, the parties stipulate and agree as follows:

1. Debtor agrees to the granting of Relief from Stay to Deutsche Bank National Trust Company, as Trustee for American Home Mortgage Assets Trust 2006-1, Mortgage-Backed Pass-Through Certificates, Series 2006-1 for the Property known as 25 Widgeon Road, Fire Island Pines, New York, 11782.
2. The automatic stay will be vacated, terminated and/or annulled to permit the Movant to institute or resume and prosecute to conclusion one or more action in the court of appropriate jurisdiction to pursue the Movant's rights.
3. Movant, its successors or assignees, may proceed with its rights and remedies under the terms of the subject mortgage and pursue its state court remedies including, but not limited to, taking the property to sheriff's sale, in addition to potentially pursuing other loss mitigation alternatives, including, but not limited to, a loan modification, short sale or deed-in-lieu foreclosure. Additionally, any purchaser of the property at sheriff's sale (or purchaser's assignee) may take any legal action for enforcement of its right to possession of the property.
4. Entire Agreement. This Stipulation contains or expressly incorporates by reference the entire agreement of the parties and supersedes all prior negotiations.

This Agreement shall not be modified or amended except by a written instrument executed by all parties.

**IN WITNESS THEREOF** and intending to be a legally bound hereby, the parties to the above-captioned action, by their respective attorneys, each of whom has been expressly authorized to enter into this Stipulation of Settlement, set their signatures below.

Dated: December 7, 2022

/s/ Andrew Spivack  
Andrew Spivack, Esquire  
Attorney for Movant

/s/ Ronald McNeil  
RONALD G. MCNEIL, Esquire  
Attorney for Debtor

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**ORDER**

**AND NOW**, this \_\_\_\_ day of \_\_\_\_\_, 2022, it is hereby **ORDERED** that the corresponding Stipulation is hereby approved, shall be, and is hereby made an Order of this Court.

\_\_\_\_\_  
Honorable Ashely M. Chan  
United States Bankruptcy Judge